

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

AMERICAN NEWS & INFORMATION SVCS. INC. and EDWARD PERUTA Plaintiff	*	CIVIL ACTION NO.
	*	3:15-CV-01209-RNC
	*	
vs.	*	
	*	
JAMES C. ROVELLA, MICHAEL COATES, BRANDON J. O'BRIEN, SEAN SPELL, BRIAN FOLEY, ET AL. Defendants	*	MARCH 22, 2017
	*	
	*	

VIDEOTAPE DEPOSITION
OF
DEPUTY CHIEF BRIAN FOLEY

Taken before Patricia Tyszka, Registered Merit Reporter and Notary Public, in and for the State of Connecticut, pursuant to the Federal Rules of Civil Procedure, at the Law Offices of Rachel M. Baird & Associate, 15 Burlington Road, Harwinton, Connecticut, on Wednesday, March 22, 2017, commencing at 2:35 p.m.

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A P P E A R A N C E S

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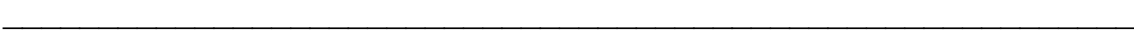
ALSO IN ATTENDANCE:

Edward Peruta

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Transcript Legend

- [sic] - Exactly as said.
- [phonetic] - Exact spelling not provided.
- [...] - Indicates omission of word[s] when reading OR trailing off and not finishing a sentence.



Direct Examination by Ms. Baird	7
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LIST OF EXHIBITS
[Marked for Identification]

DEPUTY CHIEF BRIAN FOLEY

PLAINTIFF

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
63	Duplicate of Disk Exhibit 61H	6
64	2/16/07 General Order 2.08 (18 pgs) ..	9
65	Duplicate of Exhibit 64 for Deputy Chief Foley (18 pgs)	16
66	Duplicate of Exhibit 27 for Deputy Chief Foley (7 pgs)	16

**REPORTER'S NOTE: All exhibits retained
by Court Reporter.

S T I P U L A T I O N S

1
2
3 It is stipulated by the Attorneys for the Plaintiff
4 and the Defendant that each party reserves the right to
5 make specific objections in open court to each and every
6 question asked and the answers given thereto by the
7 witness, reserving the right to move to strike out where
8 applicable, except as to such objections as are directed to
9 the form of the question.

10 It is stipulated and agreed to the adequacy of the
11 notice.

12 It is stipulated and agreed between counsel for the
13 parties that the proof of the authority of the Commissioner
14 before whom this deposition is taken is waived.

15 It is further stipulated and agreed that the Deponent
16 will read and sign the deposition transcript.
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DEPUTY CHIEF BRIAN FOLEY,
Deponent, of Hartford Police Department, 253 High
Street, Hartford, Connecticut 06103, after first
having been duly sworn by the Court Reporter,
testified under oath as follows:

[Mr. Peruta not present.]

[Plaintiff Exhibit 63-66: Marked for ID.]

MS. BAIRD: Just to place on record before
we begin, I marked a disk, Plaintiff's
Exhibit 63, that the previous deponent,
Ms. Bainer, viewed, and I represented that it's
an exact duplicate of the disk that came
attached to Exhibit 61 that Ms. Taylor brought
yesterday. So I had indicated I would mark this
as a new exhibit just out of caution to make
sure everyone's in agreement that it's an exact
duplicate, because we didn't have that disk
available today. So that's 63.

DIRECT EXAMINATION

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BY MS. BAIRD:

Q Good afternoon. How are you?

A I'm well. Thank you.

Q Good. My name is Rachel Baird, and I represent American News & Information Services and Ed Peruta in a case brought against you and other officers and Chief Rovella of the Hartford Police Department. Are you aware that's why you're here today?

A Clear.

Q Have you been through the deposition process previously?

A I have.

Q On approximately how many occasions?

A A dozen?

Q Okay. And what was the last time?

A Gee whiz. I guess it would be -- what's his name? Oh, boy. Ken Krayeski?

Q Okay.

A A year or two ago?

Q Okay. So you're familiar with the process, it sounds like --

A Yeah.

Q -- but I'll just go over it quickly.

1 A Okay.

2 Q If you need a break, let me know and we can
3 provide the facilities or any accommodations you need --
4 not "any" accommodations; within reason --

5 A Okay.

6 Q -- accommodations that you need. If you have
7 any questions to your counsel, let me know. If anything's
8 not clear or for any reason you feel like you can't answer
9 accurately or focus, let me know that as well, because our
10 goal here is to have as accurate a record as possible.

11 A Okay.

12 Q So I will begin with what is your current job
13 and position?

14 A I am a police officer assigned to the Hartford
15 Police Department holding the rank of Deputy Chief. I am
16 the commander of our Investigative Services Bureau,
17 Detective Bureau.

18 Q How long have you held the position of deputy
19 chief?

20 A Three plus.

21 Q Are you the only deputy chief?

22 A I think there's five of us.

23

24 [Mr. Peruta joined proceedings.]

25

1 BY MS. BAIRD:

2 Q You also serve in a capacity as Public
3 Information Officer?

4 A Yes, ma'am.

5 Q Does anyone else hold that position besides you?

6 A No. No. Last person that had it was a civilian
7 and they got -- I don't know if they were laid off,
8 transferred or terminated, or how it worked.

9 Q How long have you held the position as PIO?

10 A It's unclear.

11 Q And who was the civilian that held it before
12 you?

13 A Nancy Mulroy.

14 Q Does anyone assist you or do you supervise
15 anybody in your role as PIO?

16 A Not really. You know, on occasion.

17 Q And what duties do you have as the Public
18 Information Officer?

19 A They are many.

20 Q Are they listed in any policy or procedure?

21 A Possibly.

22 Q Okay. This has been marked as Exhibit 64 and
23 you should probably have a copy. Do you recognize
24 Exhibit 64?

25 A I do.

1 Q And if I could direct your attention to page 6
2 of 18, are some of your duties outlined under Section D
3 and elsewhere in this General Order?

4 A Section D; right?

5 Go ahead. I read Section D.

6 Q Okay. Sure. Are some of your job duties and
7 responsibilities outlined in --

8 A Certainly.

9 Q -- Section D?

10 MS. HARRIS: Hold on one second.

11 Just let her get the whole question out
12 before you start answering because it makes the
13 court reporter's life difficult. So even though
14 you know where Attorney Baird is going, let her
15 get the whole question out before you answer.

16 Thank you.

17 BY MS. BAIRD:

18 Q And on the second page of Exhibit 64 it, under
19 "Definitions" has "Public Information Officer (PIO)."
20 It's on page 2 of 18. Does that describe you and your
21 duties for the Hartford Police Department -- or one of
22 your duties?

23 A Yes.

24 Q Okay. Have you seen Exhibit 64 previously?

25 A Yes.

1 Q Did you have any input into the drafting of
2 Exhibit 64?

3 A Yes.

4 Q What was that input?

5 A Read it as it was being drafted, rough drafts of
6 it. And make recommendations or suggestions.

7 Q Now, providing you with Exhibit 27, have you
8 seen Exhibit 27 previously?

9 A Yes.

10 Q Am I correct that Exhibit 64 has rescinded
11 Exhibit 27?

12 A I believe so.

13 Q Is the Hartford Police Department engaged in a
14 process of accreditation?

15 A I believe so.

16 Q Is the new media policy in Exhibit 64, effective
17 date February 16th, 2017, related to that accreditation?

18 A You would have to ask our accreditation person
19 that question.

20 Q And who is that?

21 A Captain Thody.

22 Q Did you -- was it Captain Thody who you assisted
23 in drafting or reviewing Exhibit 64?

24 A Yes.

25 Q And was there a particular reason, if you know,

1 why you were involved in assisting the captain in drafting
2 or reviewing Exhibit 64?

3 A You'd have to ask the captain.

4 Q Have you been involved in the past six months in
5 assisting or reviewing any other General Order revisions?

6 MR. HARRIS: Objection.

7 You can answer.

8 A I believe so.

9 BY MS. BAIRD:

10 Q Okay. And do you know which ones?

11 A I don't.

12 Q This is Exhibit 26. Have you seen that document
13 previously?

14 A This document? No.

15 Q Okay. Have you seen a table of contents for the
16 Hartford Police Department containing a listing of General
17 Orders, Special Orders, Department Directives,
18 Memorandums, Training Bulletins, Forms, and Standard
19 Operating Procedures?

20 A There is a document similar to this on our
21 P-drive for policy and procedures.

22 Q Just policies and procedures?

23 A I don't know.

24 Q In what ways, if you know, was the media policy,
25 General Order No. 2-08, revised from its previous version

1 effective 2/16/17?

2 A Can you repeat that?

3 Q In what ways was General Order No. 2-08, which
4 is Exhibit 64 --

5 A Okay.

6 Q -- revised from the previous No. 3-1 media
7 policy that's Exhibit 27?

8 MR. HARRIS: Just note my objection.

9 But you can answer.

10 A I can read through each document and go over
11 each sentence and change if you'd like, but there are
12 several changes, I'm sure.

13 BY MS. BAIRD:

14 Q But other than knowing that you're sure there
15 are several changes, you're not aware of any specific
16 changes just sitting here today?

17 A I'm aware of many. I could list them for you if
18 you want to go through both documents.

19 Q Okay. Let's do that.

20

21 [Mr. Peruta left proceedings.]

22

23 A All right.

24 All right. Right away I can see the first
25 sentence in 64, the purpose of the General Order, the

1 sentence is much different. "The purpose of the General
2 Order is to establish a written directive which describes
3 the Hartford Police Department's policies, guidelines,
4 and procedures regarding the release of information to
5 the news media and the public."

6 And if you look at -- I'm sorry, I digress.
7 There's much different stuff here at the top as well.
8 Looks like the header on it is different from the header
9 on the previous policy, with a lot more numbers as well.
10 I'm going to need a pen and a highlighter so we can get
11 through this.

12 BY MS. BAIRD:

13 Q A pen and a highlighter?

14 A Yes.

15 MS. HARRIS: Hold on.

16 A If we're going to go through both documents
17 sentence by sentence as to go over the changes, I'm going
18 to need a pen and a highlighter.

19 MS. HARRIS: Just -- yeah, hold on one
20 second. She hasn't asked you to do that.

21 THE WITNESS: Okay.

22 MS. HARRIS: So we're going to limit our
23 questions to what Attorney Baird has asked you.

24 And I don't know that we want to get into
25 marking up exhibits that are --

1 MS. BAIRD: Well, no.

2 MS. HARRIS: Which have been referenced by
3 other people. So --

4 MS. BAIRD: Although we could, and that
5 could be his. And then if somebody else
6 testifies, it could be theirs.

7 BY MS. BAIRD:

8 Q I mean I wanted to focus on substantial changes,
9 but I understand that you want to be complete and answer
10 my question thoroughly and make sure everything I
11 addressed is responded to. So we can go through it word
12 by word if you'd like. I have no problem with that.

13 So is there anything else you need?

14 A I don't know, yeah --

15 Q A piece of paper or --

16 A Sure. A notebook?

17 MR. HARRIS: No. You're not creating notes
18 for Attorney Baird. No.

19 THE WITNESS: Okay.

20 MS. HARRIS: Just hold on, Rachel. In
21 terms of the exhibits, these exhibits, at least
22 one of them has previously been testified to by
23 other witnesses.

24 MS. BAIRD: That's true. We can mark
25 another one, though. I have plenty of copies.

1 This is the only one. We could mark this as --
2 MR. HARRIS: So if you want to mark
3 something as a separate exhibit so that they're
4 not confused later.

5 MS. BAIRD: Okay. Well, that's 65.

6 MR. HARRIS: If you're asking him to mark
7 up exhibits.

8 MS. BAIRD: Yes.

9 So for Deputy Chief Foley we could mark
10 the -- what's now 64 as the next exhibit to be
11 marked up, and then what is now 27 as the
12 exhibit after that to be marked up. There we
13 go.

14

15 [Plaintiff Exhibit 65, 66: Marked for ID.]

16

17 BY MS. BAIRD:

18 Q Okay. Handing you 65 and 66.

19 A Perfect. Thank you. Okay, what are you asking
20 me to do?

21 Q Okay. First of all, are you able to look at
22 Exhibit 65 and 66 and answer whether there have been
23 changes made?

24 A I am able to do that.

25 Q Okay. And are you able to differentiate between

1 substantive changes and grammatical or nonsubstantive
2 changes?

3 A I guess that all depends on your definition
4 of --

5 Q Exactly. So we'll go through all the changes
6 then --

7 A Okay.

8 Q -- if we can't agree on a definition. I
9 understand completely.

10 MR. HARRIS: Can you just put on the record
11 which one is which exhibit?

12 MS. BAIRD: Yes.

13 Exhibit 66 is the same document as
14 Exhibit 27, which is the General Order effective
15 date 4/1/01. And 65 is the same document as
16 Exhibit 64, with a reissue effective date of
17 2/16/17.

18 BY MS. BAIRD:

19 Q Okay. I think where we left off then was you
20 were noticing the change in Section I under "Purpose," but
21 then you backtracked and said there were some changes in
22 the heading as well.

23 A Yeah. Yeah. Looks like there's a lot of
24 differences there.

25 Q Okay. We don't need to go through the changes

1 in the heading. And if I can direct your attention to
2 No. I, "Purpose."

3 A Yeah.

4 Q Okay. This is a document, No. 65, that am I
5 correct you participated in drafting and reviewing?

6 A Reviewing.

7 Q Okay. Do you know who drafted it?

8 A Captain Thody's office. Policy and
9 Accreditation, I believe.

10 Q When did you review it?

11 A Some point last year, I believe?

12 Q Was Exhibit 66, with an effective date of
13 4/1/01, a media policy that had any relationship to your
14 job duties between 4/1/01 and February 16, 2017?

15 A All right. Can you ask that question again?

16 Q Yes. Sure. Exhibit 66 --

17 A Yeah.

18 Q -- the General Order, Media Policy --

19 A Yes.

20 Q -- did that have a relationship to your job
21 duties between 4/1/01 and 2/16/2017?

22 A Yes.

23 Q Did it have a relationship to your position as
24 the Public Information Officer?

25 A Yes.

1 Q Are there other General Orders that you know of
2 that had a relationship to your duties as Public
3 Information Officer?

4 MR. HARRIS: Objection to form.

5 You can answer.

6 A Yeah, all policy and procedures would be
7 effective in regards to my duties as Public Information
8 Officer.

9 BY MS. BAIRD:

10 Q Are there other policies that specifically
11 address your duties as the Public Information Officer?

12 A I am certain.

13 Q Okay. But you're not familiar with Exhibit 26
14 to identify the other General Orders that are specific --

15 A What I can tell you is that in certain orders
16 there's certain sections that deal with media and what
17 can be shared publicly.

18 Q Okay.

19 A And without reviewing every single order, that I
20 can tell you those are out there.

21 Q Getting back to Section I, then, of Exhibit 65.
22 What changes, if any, were made in Exhibit 65 from the
23 General Order it rescinded in Exhibit 66?

24 A The purpose established "guidelines for Hartford
25 Police Department personnel in regards to media relations

1 and the release of information to the news media and the
2 public." That is from the old version 66.

3 The newer version says "The purpose of this
4 General Order is to establish a written directive which
5 describes the Hartford Police Department's policies,
6 guidelines, and procedures regarding the release of
7 information to the news media and the public."

8 So as you can see, there's some differences in
9 the sentence there.

10 Q Okay. And how have the differences in the
11 sentence in the newer media relations policy, Exhibit 65,
12 impacted -- if they have impacted -- your duties as the
13 Public Information Officer?

14 A Hmm. I'm unaware of how they've impacted it.

15 Q Okay. Is there a difference between a written
16 directive and guidelines?

17 A I'm sure.

18 Q Okay.

19 A I'm guessing.

20 Q Well, this is a policy that you have to follow;
21 correct?

22 MR. HARRIS: So don't guess. All right?
23 Answer what you know. Don't guess and don't
24 speculate.

25 A Or I don't know.

1 BY MS. BAIRD:

2 Q It's a policy that you have to follow.

3 A Yeah.

4 Q And you don't know -- you don't know the
5 difference between the "written directive" reference in
6 Exhibit 65 and the reference to "guidelines" in
7 Exhibit 66.

8 MR. HARRIS: Objection.

9 A I'd give them equal weight in this format here
10 because this is a written directive. Even though it says
11 "guidelines," it looks like a written directive. But
12 again, as you can see, there's many policies here. I
13 have not committed them all to memory.

14 BY MS. BAIRD:

15 Q Okay. Exhibit -- when was the last time you
16 read Exhibit 65?

17 A A few weeks ago?

18 Q Do you keep a copy of it in your office?

19 A Yeah. It's on my computer.

20 Q Does it guide you in your day-to-day
21 assignments?

22 A I read it and I try to act within it. So yes.

23 Q And you are the Public Information Officer;
24 correct?

25 A I don't know if that's ever clearly been

1 designated.

2 Q Oh. Okay. So you're not sure if you're the
3 Public Information Officer as it's defined --

4 A I wouldn't know how --

5 Q -- in Exhibit 65?

6 A I wouldn't know how -- no one ever came over and
7 put a crown on my head that said "Public Information
8 Officer."

9 Q Okay.

10 A It's just sort of evolved that way.

11 Q So you don't know if you're the individual who
12 is designated by the Chief of Police to serve as a central
13 source of information for release by the Department and
14 responds to requests for information by the news media and
15 the public?

16 A I've never received written directive that I
17 was.

18 Q So somebody else at the department could be the
19 person designated by the chief of police as the central
20 source of information.

21 A In theory.

22 Q Yeah. Do you know if that person does exist?

23 A Unknown.

24 MR. HARRIS: Can I talk to you outside for
25 a second?

1 THE WITNESS: Yes.

2 MS. BAIRD: We may have to come back. I
3 think we will.

4 THE WITNESS: All right.

5 MS. BAIRD: Because it's seven hours and
6 we're not going to get that in today.

7 MS. HARRIS: Well --

8 MS. BAIRD: Yeah. No, we're going to have
9 to come back.

10

11 [Off record: 2:58 p.m. to 3:01 p.m.]

12

13 BY MS. BAIRD:

14 Q Going back to Exhibit 65 then, I had asked
15 you -- I forget exactly, so excuse me if I'm not verbatim.
16 But I believe I had asked you if you know who the
17 individual designated by the chief of police currently to
18 serve as the central source of information at the
19 department is?

20 A While I've seen no written designation, I
21 believe that is me.

22 Q And would you agree with me that in Exhibit 65,
23 on page two where it says "Public Information Officer," it
24 doesn't require a written designation by the language
25 there, does it?

1 A Not by the language.

2 Q Do you know of anyone else currently who's
3 designated by the chief as the central source of
4 information for the department?

5 A No.

6 Q And the policies and procedures contained within
7 Exhibit 65 are policies and procedures that are intended
8 for the Public Information Officer to follow; correct?

9 A Correct.

10 Q I mean everyone has to follow them; right?

11 A Yes.

12 Q But you're the central source of information,
13 and you're the person who follows them from a central
14 source or -- do you know what I mean? You're like the
15 main person who is responsible for following the
16 directives in Exhibit 65.

17 MR. HARRIS: Objection to the form.

18 You can answer.

19 THE WITNESS: She didn't ask a question.

20 BY MS. BAIRD:

21 Q Okay. Are you the central person at the
22 Hartford Police Department designated to follow the
23 policies and procedures in Exhibit 65?

24 MR. HARRIS: Objection.

25 You can answer.

1 A I think everyone has to follow them equally.

2 BY MS. BAIRD:

3 Q It's going to take me a while to form questions
4 because I want to save time to correctly give them to you
5 so --

6 A I'm fine.

7 Q Right.

8 A Thank you.

9 Q So I want to make sure --

10 A Take your time.

11 Q -- to complete -- because I know you're being
12 very careful about, you know --

13 A As you would be too. Yes.

14 Q Exactly. So I want to get the questions exactly
15 right.

16 Did you have any input into any changes that
17 were made in the policy reflected in Exhibit 65 from the
18 policy exhibited in 66?

19 A Yes.

20 Q And what was your input?

21 A I don't remember.

22 Q Okay. Would there be notes or other documents
23 reflecting that input?

24 A I recall going into an office and going over the
25 documents verbally with Captain Thody. In a conference

1 room, I'm sorry.

2 Q Was anybody else other than the captain present
3 with you?

4 A I don't believe so, but I'm -- that could be --
5 there could have been others there. This was a while
6 ago.

7 Q I think you had said maybe a year ago?

8 A Yeah.

9 Q I can't remember. Okay.

10 And did you have any additional conferences or
11 discussions with the captain, other than this one you've
12 talked about in the conference room?

13 A There may have been --

14 Q About the media policy.

15 A Right. Understood. There may have been casual
16 conversation about it.

17 Q Did Captain Thody indicate to you at all why the
18 General Order reflected in 66 was being updated or
19 rescinded by Exhibit 65?

20 A Not specifically.

21 Q Did he say generally?

22 A Not that I remember specifically that I can
23 answer.

24 Q How long, again, have you believed that you are
25 the Public Information Officer?

1 A Three years?

2 Q During those three years did you encounter any
3 situations as the Public Information that you -- Public
4 Information Officer that you brought to the attention of
5 Captain Thody that resulted in changes to the media policy
6 as reflected in Exhibit 65 from 66?

7 A Can you ask that again?

8 Q Yeah. During your three years as the Public
9 Information Officer, did you encounter any situations or
10 concerns that you brought to Captain Thody's attention
11 that required updating or changing the General Order
12 regarding media policy?

13 A I'm sure.

14 Q And do you recall any?

15 A Specifically, no. Just the need for it to be
16 updated.

17 Q And what led you to a determination or a belief
18 that the media policy needed to be updated?

19 MR. HARRIS: Objection.

20 I just -- give me a second to object before
21 you start answering the questions.

22 Objection. But you can answer.

23 A Okay. The policy created in 2001 was created
24 long before social media had evolved, and I felt there
25 was a need for our policy to reflect that media persons

1 be treated as any other citizen on the street. This is
2 before -- this policy was created before video cameras,
3 phone cameras. I mean -- and social media were what they
4 are today. As it was when this was created in 2001 is --
5 there is obviously a great difference. So I felt that
6 the policy did need to be updated.

7 BY MS. BAIRD:

8 Q Had you encountered any particular problems or
9 concerns as a result of the policy reflected in Exhibit 66
10 not really addressing the rise of social media?

11 MR. HARRIS: Objection.

12 You can answer.

13 A You know, I -- I took some training at some
14 point, and I had some philosophical beliefs that media
15 people should be treated -- as did the chief -- as any
16 other citizen on the street and have those same rights.
17 That's what I wanted to reflect in the policy. And
18 that's what -- that's how since I've been doing my job
19 I've done my job.

20 BY MS. BAIRD:

21 Q In terms of your position as you just stated
22 it -- and I won't attempt to restate it -- but as you just
23 stated it, was that reflected or not in Exhibit 66?

24 That -- I believe you said media should be treated --

25 A No, this was antiquated. I -- I'm sorry.

1 MR. HARRIS: Objection.

2 You can answer. Go ahead.

3 A I felt it was antiquated and, reading it, I felt
4 that it needed change and that I was -- I -- a lot of the
5 things I did were different from this policy.

6 BY MS. BAIRD:

7 Q Okay. So I'm going to try to shorten this up
8 and guess what you mean, but if I'm not right let me know.
9 So let me direct your attention to Exhibit 66.

10 A Yeah.

11 Q Under "Policy," Section II, Subsection C. Now,
12 the second sentence of Subsection C indicates that "media
13 representatives may cross police lines with the express
14 permission of the incident commander." And that appears
15 to give more access to media representatives; am I
16 correct?

17 A Yes.

18 Q And am I correct that that concerned you because
19 you wanted to equate the media with the rights of general
20 citizens? You didn't want to give the media more rights?

21 MR. HARRIS: Objection.

22 You can answer.

23 A No, I didn't have a problem with this one.

24 BY MS. BAIRD:

25 Q Okay. Are you able to look at 66 and we can go

1 through it page by page and you can indicate what
2 concerned you as being antiquated?

3 A Sure.

4 Q Okay. Thank you.

5 I'm on page one now. Is there anything on page
6 one of Exhibit of 66 that concerned you --

7 A Yes.

8 Q -- because it may have been antiquated? Yes.

9 MS. HARRIS: Just let her get the question.

10 THE WITNESS: Yeah. I mean are you
11 objecting?

12 MS. HARRIS: I'm not objecting, I'm just
13 trying to instruct you to let her get the
14 question out before you answer.

15 BY MS. BAIRD:

16 Q Okay. And what item or items on page one of
17 Exhibit --

18 A Let's start right at the first sentence here.
19 Section II, A. "It is the policy of the Hartford Police
20 Department to cooperate fully and impartially with" --
21 "authorized," I don't like the word "authorized" -- "news
22 and media representatives."

23 This was created before bloggers. This was
24 created before social media. I don't like that
25 "authorized news media." What is an authorized news --

1 that's confusing to me.

2 Q Anything else in Subsection A?

3 A Hold on.

4 Nope.

5 Q Subsection B.

6 A Fine with that.

7 Q Okay. Directing your attention to Subsection C.

8 And the question is going to remain is there anything in
9 that subsection that you identified as antiquated due to,
10 as you've represented, have been changes in social media
11 since 2001.

12 A No, I don't believe that to be antiquated.

13 Q What -- is it -- I'm still on Subsection C on
14 page one of Exhibit 66. Is it the incident commander's
15 discretion entirely of whether to allow media
16 representatives to cross police lines?

17 A I'd say it's a combined incident commander,
18 investigative lead, or who's the lead detective at an
19 incident. It could be many people, but it is some -- it
20 is a rare event that you would allow someone to do that.

21 Q Anything in Exhibit D that you identified as
22 antiquated?

23 MR. HARRIS: You mean paragraph D?

24 BY MS. BAIRD:

25 Q I'm sorry. Paragraph D, Exhibit 66.

1 A No.

2 Q E or F.

3 A No.

4 Q If I could ask you a question about Subsection F
5 on page one of Exhibit 66?

6 A Yeah.

7 Q Is there a process for distributing changes to
8 the General Order regarding media policy to local media
9 outlets?

10 A Can you ask that again?

11 Q Yes. In Subsection F under "Policy" on page one
12 of Exhibit 66, the last line of Subsection F says "changes
13 to this order will be distributed to local media outlets."
14 Is there a procedure for doing that? A listing of numbers
15 or addresses or contact information defining --

16 A No.

17 Q -- who local media outlets are?

18 A No.

19 Q Anything in A, B, or C under "Definitions" in
20 Section III on page two of Exhibit 66 that you identified
21 as antiquated?

22 A I would -- let me go back here. Looking at
23 Section F.

24 Q Okay.

25 A I would say that is a little antiquated. Any

1 changes in our policy and procedures should be made
2 public to anyone who asks, not just media outlets as this
3 says. Providing it doesn't put officers at risk,
4 investigations at risk, that sort of thing.

5 Q And under III, "Definitions," on the second page
6 of Exhibit 66, under A, B, or C did you -- or do you
7 identify anything as antiquated in those three sections?

8 A B.

9 Q And what do you identify in B as antiquated?

10 A Essentially anyone with a cell phone and a
11 computer is a member of the media these days.

12 Q And did you offer that input to anyone at the
13 police department?

14 A Specifically I'm not sure.

15 Q And just directing your attention to Exhibit 65,
16 under the definition of "News Media Representatives" on
17 page two, do you agree that the definition of a news media
18 representative in Exhibit 65 still references "individuals
19 who are directly employed by agencies of the electronic or
20 print media" as is referenced in Exhibit 66 in the
21 definition of "news media representative"?

22 A Yes.

23 Q Okay. And just in your opinion as the Public
24 Information Officer, do you view the definition of "news
25 media representative" in Exhibit 65 as still somewhat

1 antiquated?

2 MR. HARRIS: I'm going to object. He's not
3 here to give you an expert opinion.

4 MS. BAIRD: Okay.

5 MS. HARRIS: And just to make sure it's on
6 the record, I do object to the whole line of
7 questioning about what Deputy Chief Foley finds
8 antiquated versus not is irrelevant. I'm going
9 to allow you to continue asking your questions,
10 but I just want to make sure it's on the record.
11 Thank you.

12 MS. BAIRD: Are you directing him not to
13 answer that question?

14 MS. HARRIS: I'm sorry. What was the last
15 question? I just realized I don't think I had
16 gotten my objection on the record. I wanted to
17 make sure I did.

18
19 [Last question read back by reporter.]

20
21 MR. HARRIS: Yes, I'm going to claim that
22 question since that was not in effect at this
23 point in time, and he's not here to provide you
24 with an expert opinion.

25 MS. BAIRD: What wasn't in effect at this

1 point in time?

2 MR. HARRIS: The current -- I'm sorry. Let
3 me state that. You asked about Exhibit 65.

4 MS. BAIRD: Right.

5 MR. HARRIS: Which is the media policy with
6 effective date of 2/16/2017, which was not in
7 effect at the time of Mr. Peruta's complaint.
8 So to the extent of whether Deputy Chief Foley's
9 opinion -- he's here as a fact witness. He's
10 not here to provide an expert opinion. It's not
11 relevant to Mr. Peruta's complaint, and he's not
12 providing an expert opinion as to whether or not
13 this current policy is antiquated or otherwise
14 meets any other standard --

15 MS. BAIRD: Well, let me attempt to lay a
16 foundation.

17 BY MS. BAIRD:

18 Q Did you convey any opinions or concerns about
19 the media policy effective date 4/1/01, Exhibit 66, in
20 discussions with Captain Thody?

21 A Yeah.

22 Q And were some of those concerns related to the
23 antiquated nature of some of the provisions in the media
24 policy effective date 4/1/01, given social media?

25 A Yes.

1 Q And was one of those concerns the definition of
2 "news media representatives" contained in Exhibit 66 under
3 "Definitions" Subsection B?

4 A Yes. I believe so as my personal opinion.

5 Q Any other provisions in Subsection III of
6 Exhibit 66, in A, B, or C, that you identify as antiquated
7 in your input concerning that policy?

8 A No.

9 Q Moving on then to the "Procedures" under Section
10 IV, which contains subdivisions A through D to conclude
11 this 7-page policy in Exhibit 66. Any concerns in Section
12 IV? And I can start with Subsection A.

13 MR. HARRIS: Objection to the form.

14 A What are you asking?

15 BY MS. BAIRD:

16 Q I'll keep repeating it. Any concerns about the
17 antiquated nature of provisions in Section IV, Subsection
18 A of Exhibit 66?

19 MR. HARRIS: Again I object to any line of
20 inquiry that falls under expert category.

21 MS. BAIRD: That you --

22 MS. HARRIS: I'm just trying to figure, did
23 you --

24 MS. BAIRD: His input to Captain Thody.

25 Yes. Yes. And I'll repeat it for every

1 question.

2 BY MS. BAIRD:

3 Q Do you want me to repeat it?

4 A Repeat what?

5 Q The question.

6 A Sure.

7 Q Okay. Directing your attention to Section IV,
8 "Procedures", Subsection A, "Duties of the Public
9 Information Officer" in Exhibit 66 at page two, did you
10 convey any concerns about the antiquated nature of any
11 provisions to Captain Thody when giving input about the
12 media policy during the conversation in the conference
13 room, or otherwise in the course of drafting or reviewing
14 the policy -- the new policy?

15 A That was a long question.

16 Q It was. I'll repeat it for every one if I can
17 get it straight.

18 MR. HARRIS: Yes, you can answer that
19 question.

20 BY MS. BAIRD:

21 Q Okay. Yes.

22 MR. HARRIS: You can answer that question.

23 A Oh. No, I thought you were going to repeat it.

24 MS. HARRIS: We'll have the court reporter
25 read it.

1 MS. BAIRD: I'm going to have her read that
2 one back.

3 THE WITNESS: Okay. Go ahead.

4
5 [Last question read back by reporter.]

6
7 A It's possible, but I can't think of anything
8 specific at this time.

9 BY MS. BAIRD:

10 Q And if I were to ask you the same question that
11 the court reporter just read back to you, about Subsection
12 B on page three of Exhibit 66, would that be clear to you?

13 A I'd have to review it.

14 Q Okay. I'll do it again then.

15 Directing your attention to Subsection B, on
16 page three of Exhibit 66 to Section IV, whereas
17 Subsection B is entitled "Cooperation with the Media,"
18 are there any provisions under that Subsection B on
19 page three of Exhibit 66 that you identified to Captain
20 Thody as antiquated, in the conversation you had with him
21 in the conference room or in any other discussions with
22 him where you gave input or drafted or reviewed the new
23 policy that rescinded Exhibit 66 and is before you as
24 Exhibit 65?

25 A I'm not so sure I used the word "antiquated"

1 with him --

2 Q Oh.

3 A -- to describe any of that.

4 Q Okay.

5 A And I'd have to review to see if I can recall
6 anything specifically.

7 I remember No. 2.

8 Q And in No. 2 did anything in the first sentence
9 concern you?

10 A First and second sentences. And that was that
11 I've never seen or asked for identification from media on
12 the scene. And I conveyed that to him.

13 Q In your years as the Public Information Officer,
14 how have you over those years identified members of the
15 media?

16 A By sight. Getting to know them and developing
17 relationships with each outlet.

18 Q Do you know Ed Peruta?

19 A Yes.

20 Q And when was the first time you met Ed Peruta,
21 if you recall?

22 A I have no idea.

23 Q And do you know in what capacity you met him?

24 A I don't remember specifically.

25 Q Do you know if you met him through your work

1 with the Hartford Police Department?

2 A Yes.

3 Q Okay. And do you identify Mr. Peruta as a
4 member of the media?

5 A I'd have to say yeah.

6 Q Are you familiar with American News &
7 Information Services?

8 A Only through researching this case.

9 Q What contacts do you recall having with
10 Mr. Peruta as a member of the media?

11 A I believe the first time he introduced himself
12 to me he identified himself as a member of the media.

13 Q And was that -- was that out in the community at
14 a scene or at HPD or --

15 A I believe that was in the front lobby of the
16 police station.

17 Q Do you recall that introduction?

18 A Yeah. I don't recall specifically what was
19 said, but I remember it was awkward because he came up
20 and showed me an ID and said, "I'm a member of the
21 media." And I had never asked for anyone to show me
22 their ID or anything like that, and he's the first person
23 to have ever done that to me; showed me, like, his ID and
24 the media credential ID that, you know, I'd never seen
25 issued or asked for a media credential.

1 Q Are you aware of any police departments that do
2 recognize certain media credentials?

3 A I never had that discussion.

4 Q Have you been employed by any other law
5 enforcement agencies other than the Hartford Police
6 Department?

7 A No.

8 Q How long have you been with HPD?

9 A Twenty-two plus.

10 Q Other than your reference to the sentences in
11 the Subsection 2 -- excuse me -- I guess that's Division 2
12 of Subsection B of Section IV of Exhibit 66, did you
13 have -- let me ask this. Did you have any concerns that
14 you've expressed to Captain Thody in the course of
15 reviewing or drafting a replacement -- a media policy that
16 would replace Exhibit 66?

17 A No.

18 Q If I could direct your attention to Section IV,
19 Subsection B, Subdivision 1, the first word in -- and
20 we're talking about Exhibit 66 still -- that says
21 "authorized."

22 Have you developed a method of determining what
23 media representatives are authorized or not authorized --

24 A Where are you again? I jumped ahead.

25 Q Okay.

1 A No. 1, Section B?

2 Q Yes.

3 A First word?

4 Q Yes. Do you have a method of determining who is
5 an authorized news media representative?

6 A No. Never been an issue.

7 Q Okay. So going on to Subsection C of Section IV
8 on page four of Exhibit 66. Anything in those
9 Subdivisions 1 and 2 that you recall identifying to
10 Captain Thody as a concern in the course of drafting or
11 reviewing the media policy that became Exhibit 65?

12 A Subsection 1, no.

13 No -- 2.

14 Q Thank you. And do you need me to repeat the
15 question for Subdivision 3 that begins on page five?

16 A Go ahead. Yes.

17 Q Okay. Is there anything in Subdivision 3 of
18 Subsection C that begins on page five of Exhibit 66 that
19 you recall giving input about or to Captain Thody in your
20 meeting with him in the conference room, or otherwise in
21 the course of reviewing or drafting the media policy that
22 is 65 which has rescinded Exhibit 66?

23 A No.

24 Q Is there any provision in Subdivision 4 of
25 Subsection C of Section IV that begins on page six of

1 Exhibit 66 that you brought to the attention as having a
2 concern about to Captain Thody in your discussion in the
3 conference room that you've testified about, or otherwise
4 in your drafting, reviewing or giving input into the media
5 policy that became Exhibit 66 rescinding -- 65, the media
6 policy that became 65 and rescinded Exhibit 66? And if
7 you need that repeated because I erred at the end, I will
8 do that.

9 A We should have numbered them the other way.

10 Q Yes, we should have.

11 A No, hold on. I mean no, I don't need to repeat
12 the question.

13 No.

14 Q Subdivision 8 on -- which is a subdivision of
15 Subsection C to Section IV contained on page six at the
16 bottom and numbered 8, indicates that inquiries concerning
17 policy are directed to the Chief of Police or the Public
18 Information Officer.

19 When it says "refer all inquiries," do you know
20 if that means inquiries made by Hartford police officers
21 or just anyone in general? Do you know who it's
22 addressing?

23 A I don't.

24 Q Okay. Well, this policy, is it fair to say, is
25 directed to people employed by the Hartford Police

1 Department?

2 A Say it again?

3 Q Is this policy directed to people employed by
4 the Hartford Police Department?

5 A Yes.

6 Q Okay. And is part of your job as a Public
7 Information Officer to answer questions of people employed
8 by the Hartford Police Department concerning media policy?

9 A Sure.

10 Q And do you receive inquiries like that?

11 A Sometimes.

12 Q So moving forward then to subdivision -- excuse
13 me -- Subsection D of Section IV which is on page seven of
14 Exhibit 66. Any information or provisions in those 12
15 subdivisions of Subsection D that you were concerned about
16 or offered input about to Captain Thody in the course of
17 drafting or reviewing the new media policy that's
18 Exhibit 65 rescinding 66?

19 A No.

20 THE WITNESS: May I go to the bathroom?

21 MS. BAIRD: Of course.

22

23 [Off record: 3:40 p.m. to 3:42 p.m.]

24

25 MS. BAIRD: Back on the record.

1 BY MS. BAIRD:

2 Q You have Exhibit 65 --

3 MS. BAIRD: Oh, I'm sorry.

4 THE WITNESS: Give me one second.

5

6 [Off record: 3:42 p.m. to 3:43 p.m.]

7

8 BY MS. BAIRD:

9 Q You have Exhibit 65 still in front of you?

10 A I do.

11 Q Thank you. Directing your attention to
12 page three of Exhibit 65, next to the numeral 3 that
13 indicates "Press Credentials," do you know of any press
14 credentials that the Hartford Police Department issues to
15 members of the local media?

16 A Never have seen them.

17 Q Directing your attention to page 13 of
18 Exhibit 65, under No. 8 entitled "Photographing
19 Suspects/Subjects by Media." In the second paragraph
20 where it indicates a reference to uncovered bodies -- do
21 you see that phrase "uncovered bodies"?

22 A Yeah. Let me get through that paragraph.

23 Q Okay.

24 A Yes.

25 Q Okay. Is there a provision that addresses the

1 situations addressed in the second paragraph of No. 8 on
2 page 13 of Exhibit 65, in Exhibit 66?

3 A I don't think so.

4 Q Let me direct your attention in Exhibit 66 to
5 page six, the number 7.

6 MR. HARRIS: I'm sorry. Say that again,
7 Rachel.

8 BY MS. BAIRD:

9 Q Sure. Exhibit 66, page six, No. 7 that begins
10 with "Suspects."

11 A Yeah.

12 Q Okay. Do you agree that in Exhibit 66 the
13 subject of photographing suspects is addressed as it is in
14 Exhibit 65 on page 13, under No. 8?

15 MR. HARRIS: I'm sorry. Can you read her
16 question again?

17

18 [Last question read back by reporter.]

19

20 A Looks like it's expounded on more. Yes.

21 BY MS. BAIRD:

22 Q Do you know of any provision in Exhibit 66 that
23 addresses photographing uncovered bodies? As it is --

24 A Not that I know of.

25 Q Do you know what, if anything, led to the

1 inclusion in Exhibit 65 of a reference under No. 8 on page
2 13 of "uncovered bodies"?

3 A I don't.

4 Q During your time as Public Information Officer,
5 have you encountered any issues about the media taking
6 photographs or video of uncovered bodies at crime scenes?

7 A "Any issues" is a pretty broad statement.

8 Q Okay. So are you aware, during your three years
9 as Public Information Officer, of media that have taken
10 photographs at -- I'll say homicide scenes -- of uncovered
11 bodies?

12 A I'm sure there's been scenes where media has had
13 direct camera sightline and access to homicides and
14 bodies and death and blood and all that, yes.

15 Q Are you aware of any specific occasions, that
16 you have learned of directly or indirectly, of media
17 taking photographs or video of bodies -- the body at a
18 homicide scene?

19 A Well, I know there's cameras at every homicide
20 scene, darn near every, you know, major accident scene.
21 They're there and pointed at the scene when the body is
22 there or not. I don't know when they're pressing the
23 "record" button and when they are not pressing the
24 "record" button, but they are always pointed there.

25 Q Prior to the effective date of Exhibit 65, which

1 was as reflected on Exhibit 65 February 16th, 2017, was
2 there a media policy to prevent photographs or video of
3 homicide victims?

4 A Not that I'm aware of.

5 Q Directing your attention to Exhibit 65 again, on
6 page 15. I'm sorry, page 16. Under No. 2, "General
7 Guidelines." And we're on Exhibit 65. Subdivision c.

8 A Okay.

9 Q Do you know of any similar provision to
10 Subdivision c of Division 2 on page 16 of Exhibit 65, that
11 was contained in Exhibit 66 concerning private property
12 and the media?

13 A I don't believe so. I could be wrong, but I
14 don't believe so.

15 Q And did you have any input regarding the
16 inclusion of that Subdivision c of Division 2 on page 16
17 of Exhibit 65?

18 A No.

19 Q Do you know of any issues or concerns that arose
20 which resulted in the inclusion of Subdivision c of
21 Division 2 on page 16 of Exhibit 65?

22 A I believe the -- yes.

23 Q And what were those issues or concerns that
24 arose?

25 A The -- I believe it was either the accreditation

1 model policy. They wanted it to somewhat go in
2 accordance with that. And that's why it was included, I
3 believe.

4 Q And along -- with regard to Subdivision e of
5 Division 2 on page 16 of Exhibit 65, do you know of any --
6 or can you identify any similar provision that was
7 contained in Exhibit 66 concerning prevention of a news
8 media member from access to an area solely due to the
9 possibility of injury or death?

10 A No.

11 Q And again, Subdivision f under Division 2 on
12 page 16 of Exhibit 65 when it mentions "official
13 credentials from a media representative," that's not a
14 requirement that's currently in place at the Hartford
15 Police Department?

16 MR. HARRIS: Objection to the form.

17 You can answer.

18 A Yeah, I don't -- what are you asking?

19 BY MS. BAIRD:

20 Q Okay. In Subdivision f of Division 2 on page 16
21 of Exhibit 65, it mentions "official credentials from a
22 media representative." And my question to you is is
23 there, to your knowledge as the Public Information
24 Officer, any such requirement that's currently in practice
25 whereby officers can request official credentials from a

1 media representative?

2 A I believe this Order.

3 Q Okay. So there may be, based on this Order
4 that's Exhibit 65, officers in the field who are
5 requesting official credentials from media
6 representatives?

7 MR. HARRIS: Objection.

8 You can answer if you know.

9 A That's possible. I've never seen it, but it's
10 possible.

11 BY MS. BAIRD:

12 Q Do you know what's included within the
13 definition of "proper credentials" as that term is used in
14 Subdivision f of Division 2 on page 16 of Exhibit 65?

15 A Is it in the definitions here? No.

16 Q I can't answer.

17 A Then no.

18 Q Okay.

19 Were you present at a homicide scene that
20 occurred on -- well, a homicide that occurred, and the
21 scene -- the scene of the homicide that occurred on
22 September 12th, 2014, in the City of Hartford at the
23 intersection of Park and Hungerford Streets?

24 A I'm assuming we're talking about the one that we
25 saw Ed Peruta at? Yes.

1 Q Okay. And what was the reason for your presence
2 at that scene?

3 A ISB commander.

4 Q I didn't catch that.

5 A Investigative Service Bureau's commander.

6 Q What's the Investigative Services Bureau?

7 A Chief of the Detective Bureau.

8 Q And you're the chief, right, of the Detective
9 Bureau?

10 A Yes, ma'am.

11 Q Who serves directly underneath you in the
12 Detective Bureau in the chain of command?

13 A Now?

14 Q Yes.

15 A Captain Buyak.

16 Q And on September 12th, 2014, was that different?

17 A I believe it was.

18 Q Okay. Do you recall who it was then?

19 A There would be several lieutenants under me.

20 Q Okay. This is Exhibit 4. Do you recognize what
21 kind of document that is?

22 A Yeah.

23 Q Is your presence at the scene on September 12th,
24 2014, reflected in any manner in Exhibit 4?

25 A Yeah.

1 Q Where -- where in Exhibit 4 -- or in what places
2 in Exhibit 4 is your presence reflected?

3 A At 9:42 p.m., 2142 hours.

4 Q And in Exhibit 4 at 9:42 p.m., or 2142 hours, is
5 your presence reflected by the notation of Enroute Officer
6 Foley, Brian?

7 A Yeah.

8 Q And in Exhibit 4 is that the first reference to
9 your presence at the scene?

10 A In this Heartbeat Dispatch Summary Record, yes.

11 Q Are you referenced anywhere else in Exhibit 4 as
12 being at the scene, arriving or leaving?

13 A Yes.

14 Q And where would that be?

15 A Right below it, the next line. Underneath
16 "enroute" there's "additional assignment." I'm not sure
17 what that means. And then they have me arrived at 2144.

18 Q And sitting here today, do you know if that time
19 is accurate -- 2144?

20 A No idea.

21 Q Okay. And is there any other reference to your
22 presence or departure or arrival at the scene in
23 Exhibit 44 -- in Exhibit 4?

24 A Not that I see.

25 Q Do you recall if you left the scene?

1 A At some point.

2 Q Okay.

3 A Specifically? No.

4 Q Okay. This is Exhibit 5. Do you recognize that
5 document? When I say "recognize that document," in the
6 course of your duties as a Hartford police officer do you
7 recognize what kind of document it is?

8 A It's also a Hartbeat Dispatch Record. Yes.

9 Q Okay. And are there any references in Exhibit 5
10 to your arrival, presence, or departure from the scene?

11 A Yes.

12 Q And again is the first reference at 2142?

13 A Yes.

14 Q And it indicates Enroute, Brian Foley?

15 A Yes.

16 Q And then you're also listed as "additional
17 assignment" at 2144?

18 A Yes.

19 Q Looking further, do you see any other reference
20 to your arrival, presence, or departure from that scene in
21 Exhibit 5?

22 A Well, just at the bottom it says arrived at 905.
23 I don't know if you covered that or not. "2144 905
24 Arrived." Did you cover that already?

25 Q I did not on this exhibit.

1 A Okay. So yes, it has me arrived there.

2 Q Okay.

3 A Cleared at 347.

4 Q And that's next to Unit 905; correct?

5 A I believe so, yes.

6 Q Thank you.

7 Did you prepare any written reports with regard
8 to this incident that occurred on 9/12/2014?

9 A I don't believe so.

10 Q And what was your -- what duties did you perform
11 at the scene?

12 A Specifically I don't remember exactly step by
13 step what I did. Would you like me to speak in general
14 terms what I do at a general homicide scene?

15 Q Sure. As the -- I guess as the chief of the
16 ISB?

17 A Yes. My main duties are to supervise the
18 investigation and ensure my detectives have the resources
19 they need to thoroughly conduct a professional
20 investigation.

21 Q What -- was there an arrest made in this case?

22 A I'm not sure off the top of my head.

23 Q Okay. Handing you Exhibit 7, do you recognize
24 this kind of form in your experience as a Hartford police
25 officer?

1 A Yes, ma'am.

2 Q And what is the type of form entitled Crime
3 Scene Entry Log at Exhibit 7 used for?

4 A To document who enters and exits a crime scene.

5 Q Does your name appear on Exhibit 7?

6 A Yeah.

7 Q And what does the appearance of your name on
8 Exhibit 7 indicate?

9 A That I was there.

10 Q Does Exhibit 7 include how long you were in the
11 crime scene or there?

12 A This one just has my arrival.

13 Q And are you able to tell from Exhibit 7 -- I
14 know you had said at that time there may have been two
15 lieutenants who were directly under you in the --

16 A Yeah.

17 Q -- chain of command? Are you able to tell by,
18 you know, being reminded of the names on Plaintiff's
19 Exhibit 7 who those two lieutenants might have been?

20 A I see Sigersmith did work for me, I believe, at
21 that point. That's it.

22 Q Do you recall, sitting here today, if you became
23 aware while you were on scene on September 12th, 2014, of
24 Mr. Peruta's presence?

25 A I remember seeing him there.

1 Q Okay. And you recognized him when you saw him?

2 A Yes.

3 Q And when you saw him, what was he doing?

4 A He was waving me down.

5 Q Okay. And where were you located, if you

6 recall, when --

7 A Somewhere on Park Street.

8 Q Was he saying anything to you?

9 A Yeah.

10 Q Do you recall what he said?

11 A I don't.

12 Q Were you close enough to hear him?

13 A Yeah.

14 Q How close were you?

15 A Closer than you and I.

16 Q Okay. Were you aware that Mr. Peruta filed an

17 Internal Affairs complaint about issues he had with his

18 treatment on September 12th, 2014, at the scene?

19 A This here? This case here?

20 Q No. An internal Affairs complaint with the

21 Internal Affairs department --

22 A Regarding this day here?

23 Q Yes.

24 A When I arrived on scene was I aware of that?

25 Q No. No. No.

1 A Am I aware now?

2 Q Yes.

3 A Yeah, I believe so.

4 Q And when did you become aware of that?

5 A I don't know.

6 Q Were you interviewed by anybody with the
7 Internal Affairs unit or department about a complaint made
8 by Mr. Peruta?

9 A I don't think that I was. I could be wrong, but
10 I don't think that I was.

11 Q How did you come to find out that Mr. Peruta had
12 filed an Internal Affairs complaint?

13 A I don't remember.

14 Q Fair to say you would probably know if you made
15 a written statement about it; correct? Or no.

16 A Yeah, I think so.

17 Q Okay. Did you make a written statement?

18 A I don't believe that I did.

19 Q And this interaction you described with
20 Mr. Peruta where he was closer to you than I am to you
21 now -- which looks like about 6 feet maybe?

22 A We were face to face, yes.

23 Q Face to face. How long did that interaction
24 last?

25 A No idea.

1 Q Well, was it hours?

2 A Correct. Less than that.

3 Q Okay.

4 A A few minutes at best.

5 Q And did you say anything to him?

6 A I'm sure I did.

7 Q Okay. And he said things to you?

8 A Yes. We're very cordial to one another when we
9 meet.

10 Q Okay. Yes. And what were you talking about?

11 A I don't remember.

12 Q I mean were you talking about business or --

13 A I'm sure.

14 Q Okay. Where was he located? And I guess where
15 were you located, if you were close to him?

16 A I want to say it was west of the crime scene.
17 Closer to the south side of Park Street.

18 Q Okay. So we have a map, since you brought up
19 directions. This is Exhibit 36. If I could direct your
20 attention to Exhibit 36, when you say "west of the crime
21 scene," are you referring to the left -- as you're looking
22 at it, the left side of Exhibit 6 [verbatim], left to the
23 Park and Hungerford Street intersection?

24 A Can you refresh my memory as to where the body
25 was found?

1 Q Okay.

2 MR. HARRIS: She's not allowed to answer
3 questions.

4 THE WITNESS: Okay.

5 MS. HARRIS: So just answer as best as you
6 recall.

7 A We were west of where the body was recovered.

8 BY MS. BAIRD:

9 Q Okay. And were you inside any tape? You. Any
10 crime scene tape?

11 A I don't think that we were, but I'm not -- I
12 could be wrong.

13 Q Okay. Well, do you recall seeing Mr. Peruta
14 ever inside any crime scene tape?

15 A I don't.

16 Q And this interaction that you had with
17 Mr. Peruta, was there a result or an outcome to it?

18 A I don't remember.

19 Q Okay. And did you come in contact with him at
20 any other point during your presence at the scene?

21 A I don't think so. But he was -- I think he was
22 lingering around there so I may have "hello" again. I
23 don't know.

24 Q Did you -- now, when you were at the scene as
25 the chief --

1 A Yeah.

2 Q -- of the Investigative Services unit --

3 A Mm-hmm.

4 Q -- were you also acting as the Public
5 Information Officer?

6 A Yes.

7 Q Did you interact with any other media besides
8 Mr. Peruta at the scene?

9 A Yes.

10 Q And what other media did you interact with?

11 A I can't specifically tell you, but TV.

12 Q Okay.

13 A Print.

14 Q In the conversation -- let me strike that.
15 Was Mr. Peruta the first member of the media
16 that you interacted with at the scene?

17 A I believe so.

18 Q As the PIO do you keep track in any manner of
19 media that responds to scenes?

20 A (Witness shakes head in the negative.)

21 Q That's a no?

22 A No. I'm sorry.

23 Q Did you observe -- you said Mr. Peruta was
24 lingering around. Do you know what area you observed him
25 lingering around in?

1 A Again, in an area -- he was the closest member
2 of the media to the crime scene by a block or so. They
3 were at Park and Broad, if memory serves, and he was in
4 significantly from there.

5 Q And --

6 A Or at least when I had my conversation with him
7 he was there.

8 Q Okay. And how did you become aware that there
9 were media at Park and Broad?

10 A You see them.

11 Q You saw the people or did you see trucks or
12 equipment indicative of media?

13 A Yes.

14 Q The second one? Or both?

15 A Both, most likely.

16 Q Okay. Well, looking at Exhibit 36 and assuming
17 that this is accurately portraying the intersection of
18 Park Street and Hungerford Street, is it the case that the
19 intersection of Park and Broad is about a block away?

20 A Yeah. I'd say that's the next block over, yeah.

21 Q Okay. And from your location -- you were
22 located in the crime scene --

23 A I believe so.

24 Q -- correct? Could you see --

25 A What do you mean? When?

1 Q Well -- yeah, you're right. I mean we have
2 Exhibit 7 that is the Crime Scene Log; right?

3 A Yes.

4 Q I think you still have that in front of you.

5 A Yes.

6 Q But it indicates when you went in, but not when
7 you went out; right?

8 A Correct.

9 Q So at some point maybe you went out of the crime
10 scene, but stayed in the general vicinity.

11 A Yeah.

12 Q Okay. And is it fair to say from the crime
13 scene, when you were within the crime scene, it would have
14 been difficult to see up a block to the intersection of
15 Park and Broad?

16 MR. HARRIS: Objection to the form.

17 You can answer if you understand.

18 A Ask again, please?

19 BY MS. BAIRD:

20 Q Oh, yeah. So Exhibit 7 reflects that at some
21 point you were in the crime scene.

22 A Yeah.

23 Q And I'm asking you, based on your experience
24 with this area, which -- I mean you know the -- you know
25 Frog Hollow/Parkville section of Hartford; right?

1 A Yeah.

2 Q At that time of night would you have been able
3 to see from the crime scene to the intersection of Park
4 and Broad Streets?

5 A Yeah.

6 MS. HARRIS: I'm going to object to the
7 form of the question.

8 BY MS. BAIRD:

9 Q Well, were you able to see?

10 MS. HARRIS: When you say "crime scene,"
11 are you talking about the area directly where
12 the body was located? Because if -- I think
13 there's been prior testimony that it was a large
14 crime scene. So I'm just trying to narrow down
15 where you're talking about.

16 MS. BAIRD: Okay.

17 MS. HARRIS: Specifically.

18 BY MS. BAIRD:

19 Q So what part of the crime scene were you in?

20 A Many.

21 Q Okay. Can you recall which ones?

22 A The crime scene.

23 Q And what is that? What's the crime scene?

24 A I remember being, you know, probably 10 yards,
25 15 yards from the body.

1 Q Okay. And when was it that you could identify
2 that members of the news media, other than Mr. Peruta,
3 were at the corner of Park and Broad?

4 A I don't know when. I mean that's a glance down.
5 But Peruta was in closer than Park and Broad, I believe.

6 Q Okay. So it was a glance down, and maybe you
7 could see.

8 A Yes. Cameras.

9 Q Okay. That's all I was getting at.

10 COURT REPORTER: "Yes" what?

11 THE WITNESS: Yes, cameras. You see
12 cameras.

13 A And I believe Peruta was somewhere in between
14 Park and Broad was where I walked in the front end. But
15 it was dark. It's a long time ago. I'm pretty sure it
16 was right in between Hungerford and Broad.

17 BY MS. BAIRD:

18 Q Did at any time it come to your attention while
19 you were at this incident that Mr. Peruta was told to back
20 up from where he was at?

21 A Can you ask that again?

22 Q Yes. At any time did it come to your attention
23 that officers were telling Mr. Peruta that he needed to
24 back up?

25 A Not specifically, no.

1 Q I'm going to -- have you viewed any video clips
2 taken by Mr. Peruta of the scene --

3 A Yeah.

4 Q -- at the 9/12/2014 incident?

5 A Yeah.

6 Q And how did you come to be in possession of
7 those video clips?

8 MR. HARRIS: Objection.

9 Just anything that you and I have discussed
10 she's not permitted to know, but outside of that
11 you may answer.

12 THE WITNESS: All right. So I can't talk
13 about --

14 MR. HARRIS: Our -- any attorney-client
15 so --

16 MS. BAIRD: No.

17 MR. HARRIS: -- meeting. So let me phrase;
18 it. Outside of meetings with your attorney,
19 have you viewed Mr. Peruta's video?

20 THE WITNESS: I want to say that I did, but
21 I'm -- I think I did, yes. I don't know if I
22 watched it in its entirety. Is she asking the
23 entire thing? Bits and pieces?

24 MR. HARRIS: Rachel can clarify her
25 question.

1 MR. HARRIS: I'm going to run out.

2 MS. BAIRD: Yeah, it will probably take a
3 second. It's Exhibit 24.

4
5 [Off record: 4:20 p.m. to 4:23 p.m.]

6
7 BY MS. BAIRD:

8 Q So I'm going to show you a clip from what's
9 already been marked as Exhibit 24 in this case, and we'll
10 let it play in its entirety and then I'll ask you a couple
11 of questions. Okay?

12 A All right.

13 [Video Played and Paused.]

14 BY MS. BAIRD:

15 Q Have you seen Clip 1 previously?

16 A I don't think I have.

17 Q Do you recognize any of the activity portrayed
18 in Clip 1?

19 A I recognize Officer Barone.

20 Q Okay.

21 A And I think Ed's voice.

22 Q Okay, but do you recognize --

23 A Park Street?

24 Q -- the interaction that Officer Barone and
25 Mr. Peruta were having in Clip 1? Did you witness that

1 interaction?

2 A Certainly not.

3 Q Okay. And when you say "certainly not," what
4 gives you that certainty?

5 A I didn't see that. I wasn't there at that
6 point.

7 Q Okay. This is Clip 2. Again we'll let it play
8 in its entirety.

9 [Video Played and Paused.]

10 BY MS. BAIRD:

11 Q Do you recognize -- have you seen that clip
12 before that's Clip 2?

13 MR. HARRIS: Outside of the context of
14 attorney-client --

15 MS. BAIRD: Oh, yeah. Yeah. Disregard
16 that.

17 A No.

18 BY MS. BAIRD:

19 Q Okay. Did you witness the interaction portrayed
20 in Clip 2?

21 A No.

22 [Video Played and Paused.]

23 BY MS. BAIRD:

24 Q Have you seen Clip 3 before in the course of
25 your duties?

1 A Thankfully no. I'm getting motion sickness, but
2 no.

3 Q We've heard that before.

4 Did you witness any of the interaction portrayed
5 in Clip 3?

6 A No.

7 [Video Played and Paused.]

8 BY MS. BAIRD:

9 Q Have you seen Clip 4 before in the course of
10 your duties?

11 A No.

12 Q Did you see yourself in Clip 4?

13 A I did not.

14 Q Did you witness personally any of the activities
15 portrayed in Clip 4?

16 A No.

17 Q Do you recall Mr. Peruta videotaping you at all
18 in the incident --

19 A I don't.

20 Q -- on September 12th, 2014?

21 A No, I don't.

22 [Video Played and Paused.]

23 BY MS. BAIRD:

24 Q This is Clip 5. Do you recognize this area in
25 Clip 5?

1 A I do.

2 Q And do you recognize it as where the homicide
3 victim was located?

4 A I believe so, yes.

5 Q And were you in that area that's portrayed in
6 Clip 5 at 5 seconds in? Where the EMTs are located?

7 A No.

8 [Video Played.]

9 A Wait, wait, wait. I'm sorry. Stop for a
10 second.

11 [Video Paused.]

12 A Are you asking me if I'm in that video?

13 BY MS. BAIRD:

14 Q No. I was asking you -- and we're at the
15 10-second mark in on Clip -- I believe it's Clip 5.

16 I was asking you if you were, while you were at
17 the scene, in that area of where the homicide victim is
18 between the two crime scene tapes that we can see at the
19 10-second mark?

20 A Yes, I believe so.

21 Q But you don't see yourself in this clip.

22 A I'm not there yet.

23 Q And how are you able to tell from looking at
24 this clip and the activity going on in Clip 5 that you
25 weren't yet there?

1 A EMTs were long gone by the time I got there.

2 [Video Played and Paused.]

3 BY MS. BAIRD:

4 Q Was the victim still there when you arrived?

5 A Yes, ma'am.

6 Q This is Clip 6.

7 [Video Played and Paused.]

8 BY MS. BAIRD:

9 Q During the activity portrayed in Clip 6, am I
10 correct that you weren't there yet because when you
11 arrived the EMTs had long left?

12 A Yes, ma'am.

13 [Video Played and Paused.]

14 BY MS. BAIRD:

15 Q When you arrived, do you know if the crime scene
16 tape portrayed in this clip at the 7-second mark -- and by
17 "this clip" I mean Clip 7 at the 7-second mark -- was
18 still present extending from the northeast corner of Park
19 and Hungerford to the northwest corner of Park and
20 Hungerford?

21 A I have no idea.

22 Q Okay. Did you take note of any crime scene tape
23 when you arrived?

24 A What do you mean by "take note"?

25 Q Did you notice any?

1 A Yes.

2 Q Okay. Did you -- were you involved in the
3 erection of crime scene tape?

4 A No.

5 Q Did you order the erection of crime scene tape?

6 A No. Let me help you out a little bit. It was a
7 much quieter scene by the time I got there.

8 Q Okay.

9 [Video Played and Paused.]

10 BY MS. BAIRD:

11 Q And again just to make clear, that was Clip 7,
12 and you know that you did not directly observe the events
13 in Clip 7 because the EMTs are still present, and when you
14 arrived they were long gone.

15 A Correct.

16 Q This is Clip 8.

17 [Video Played and Paused.]

18 BY MS. BAIRD:

19 Q Clip 9.

20 [Video Played and Paused.]

21 BY MS. BAIRD:

22 Q That was Clip 9. When you arrived, did you note
23 any individuals in the vicinity of the store at the
24 northeast corner of Park and Hungerford?

25 A No.

1 Q Are you familiar with the store for any reason
2 at the corner northeast -- the northeast corner of Park
3 and Hungerford?

4 A Sure.

5 Q Do you know if it was doing business when you
6 arrived? If it was open?

7 A No. I believe that whole area had been
8 sectioned off by that point.

9 Q This is Clip 10.

10 [Video Played and Paused.]

11 BY MS. BAIRD:

12 Q Do you know if you were present when the events
13 in Clip 10 occurred?

14 A I don't believe so.

15 Q This is Clip 11.

16 [Video Played and Paused.]

17 BY MS. BAIRD:

18 Q Fair to say that with regard to Clip 11, you're
19 certain you weren't there because the EMTs are still there
20 and you -- and the EMTs were long gone when you arrived?

21 A I believe so, yes.

22 Q This is Clip 12.

23 [Video Played and Paused.]

24 BY MS. BAIRD:

25 Q Fair to say with regard to Clip 12? Same

1 situation?

2 A Yes.

3 Q You did not directly observe those events
4 because the EMTs were there and you were long -- they were
5 long gone when you arrived?

6 A Correct.

7 Q Clip 13.

8 [Video Played and Paused.]

9 BY MS. BAIRD:

10 Q Did you observe any of the events that were just
11 portrayed in Clip 13?

12 A No.

13 Q In any of these clips that we've viewed, has the
14 area where you came in the face-to-face contact with
15 Mr. Peruta been portrayed?

16 A Well, he spins that camera around a lot, so it's
17 possible. But the main area that you're focusing on?
18 No. We were west of that.

19 [Video Played and Paused.]

20 BY MS. BAIRD:

21 Q Did you observe any of the events just portrayed
22 in Clip 14?

23 A No.

24 [Video Played and Paused.]

25

1 BY MS. BAIRD:

2 Q Can you tell in this Clip 15 whether the EMTs
3 are still there?

4 A I can't. I can see an ambulance there.

5 Q Okay. When you arrived was the ambulance long
6 gone?

7 A I believe so. But I'm not --

8 Q Or gone. It doesn't really matter "long", but
9 gone?

10 A I believe so, but I don't remember anyone
11 standing by the scene -- any EMTs standing over the body
12 at that point.

13 Q Now, do you recognize the gentleman standing on
14 the road, Park Road, with the white pants and the blue
15 top?

16 A Can I get up and look closer?

17 Q Yes.

18 A It's -- that looks like Rethis. That could be
19 Sigersmith.

20 Q Okay. Do you know if Sigersmith -- Lieutenant
21 Sigersmith arrived before you?

22 A I'm certain he did. I think he was working that
23 night.

24 COURT REPORTER: What was the first name
25 that you mentioned?

1 THE WITNESS: Lance Sigersmith.

2 COURT REPORTER: No. Before Sigersmith. I
3 thought you said --

4 THE WITNESS: Captain Rethis. I think
5 that's him, but I'm not positive.

6 BY MS. BAIRD:

7 Q And this is Clip 16.

8 [Video Played and Paused.]

9 BY MS. BAIRD:

10 Q Did you personally observe any of the events
11 portrayed in that clip?

12 A No.

13 Q 16.

14 A No.

15 Q Clip 17.

16 [Video Played and Paused.]

17 BY MS. BAIRD:

18 Q I'm going to stop this clip at 1 minute and 11
19 seconds in, Clip 17.

20 A Yeah.

21 Q And did you observe any of the activity
22 portrayed in Clip 17 up until the 1 minute 11 second mark?

23 A No.

24 Q Do you know if you were there then?

25 A I don't think I was. Even Mr. Peruta hadn't

1 seen me at that point because he said he was going to see
2 me on Monday morning.

3 Q Okay. Did he come see you on Monday morning?

4 A No. I saw him on the scene later on,
5 apparently. Maybe he came on Monday. Did he?

6 MR. HARRIS: You can't ask.

7 [Video Played and Paused.]

8 BY MS. BAIRD:

9 Q I stopped this clip at 2 minutes and 4 seconds
10 in. Did Mr. Peruta discuss during your interaction on
11 September 12th, 2014, a statement expressed to him by one
12 or more officers about filming a dead body?

13 A He -- I remember him specifically saying he was
14 upset about something at the crime scene. I don't
15 remember what, as I had a lot of stuff going on and it's
16 been some time. I don't think -- I can't tell you
17 exactly what it was, but he was upset I remember.

18 Q And after September 12th, 2014, did you become
19 aware of any statement made to Mr. Peruta at the scene
20 about filming a dead body?

21 A Aside from --

22 MR. HARRIS: You can't talk about anything
23 we've discussed.

24 BY MS. BAIRD:

25 Q Well, aside from this case. Not this case.

1 MR. HARRIS: So outside of --

2 A Possibly. I can't specifically pin it down,
3 though.

4 [Video Played and Paused.]

5 BY MS. BAIRD:

6 Q Do you know who Mr. Peruta is talking to in this
7 clip?

8 A I can't hear, no.

9 [Video Played and Paused.]

10 BY MS. BAIRD:

11 Q Did any officers on the scene come to you and
12 make inquiry of how they should respond to Mr. Peruta?

13 A Not that I'm aware of, no.

14 Q Did any officers at the scene come to you and
15 indicate they were having a problem with Mr. Peruta?

16 A Not that I remember, no. Mr. Peruta did.

17 [Video Played and Paused.]

18 BY MS. BAIRD:

19 Q Anything in that Clip 17 that you recognize as
20 having directly observed at that location on September
21 12th, 2014?

22 A No.

23 Q This is Clip 18.

24 [Video Played and Paused.]

25

1 BY MS. BAIRD:

2 Q Do you know if you had arrived on the scene at
3 the time of Clip 18?

4 A I can't tell.

5 Q Okay. And this is Clip 19.

6 [Video Played and Paused.]

7 BY MS. BAIRD:

8 Q Do you recognize the voice of the individual who
9 said "there's a heavy police presence"?

10 A No. Sounds like a line a media person would
11 say, though.

12 [Video Played and Paused.]

13 BY MS. BAIRD:

14 Q And that was the last clip, 19. Anything about
15 that clip that you recall as directly observing yourself?

16 A No.

17 [Video Played and Paused.]

18 BY MS. BAIRD:

19 Q Just give me a moment. I'm going to find the
20 location of the homicide victim because you had indicated
21 earlier in your testimony that might be helpful in
22 answering a question.

23 [Video Played and Stopped.]

24 BY MS. BAIRD:

25 Q Does this Clip 5 assist you in recalling where

1 the homicide victim's body was located?

2 A You bet.

3 Q Okay. And so then going back to Exhibit 36, are
4 you able to transfer that recall from -- I think it was
5 Clip 5 from Exhibit 24 -- and locate on Exhibit 36 where
6 the homicide victim's body was located?

7 A I believe so, but I'm -- I think that's
8 Hungerford Street that's going this way in the video, but
9 I'm not positive.

10 Q Okay.

11 A It could be Oak. I get them mixed up.

12 Q Okay. Do you know if the victim's body was on
13 Park Street or Hungerford Street?

14 A Park Street.

15 Q So again this map, Exhibit 36, still isn't
16 useful in identifying where you first came in contact with
17 Mr. Peruta?

18 A Generally I can answer that question.

19 Q Okay.

20 A That way somewhere. On Park Street.

21 Q Okay. So do you think it was in the block of
22 Park Street between Hungerford and Broad?

23 A It's possible, but it could have been Broad and
24 Lawrence.

25 Q Okay. Have you had any contact with Mr. Peruta

1 since September 12th, 2014?

2 A I believe so.

3 Q Do you know when?

4 A No. Maybe in the lobby a couple of times?

5 Usually I tell my attorney when he does call.

6 Q Is there a reason you tell your attorney?

7 MR. HARRIS: Objection. I'm not going to
8 have him testify as to any instructions that
9 I've given him.

10 MS. BAIRD: Okay.

11 BY MS. BAIRD:

12 Q Do you make notes of when Mr. Peruta calls?

13 A No.

14 Q How many times has he called?

15 A Half a dozen maybe, guessing?

16 Q And has it been about anything in particular?

17 A I'm sure there's things in particular.

18 Q Okay. And has it related to your job as a
19 Public Information Officer?

20 A I believe so.

21 Q And have you provided any information to him?

22 A I believe so.

23 MS. BAIRD: Okay. Let me review my notes
24 and see if there's anything else that we need to
25 ask and then I may be done.

1 MR. HARRIS: Can I talk to you outside real
2 quick?

3 THE WITNESS: Yes.

4

5 [Off record: 4:46 p.m. to 4:51 p.m.]

6

7 MS. BAIRD: Back on the record.

8 BY MS. BAIRD:

9 Q Were you present at an incident at Kelsey
10 Street, 38 Kelsey Street, on August 7th, 2015, involving a
11 Matthew Russo?

12 A Yes.

13 Q Oh, okay. What was your -- were you the Public
14 Information Officer then?

15 A Yes.

16 Q And were you also the chief of the Investigative
17 Services unit?

18 A Yes, ma'am.

19 Q Do you know when you arrived?

20 A Late.

21 Q Were you working shift that night?

22 A No. I don't know. I don't remember what I was
23 working that night.

24 Q And what was the reason for your response to the
25 scene?

1 A I don't know if I was duty chief that night, ISB
2 chief, or PIO, or a combination thereof.

3 Q When you arrived was Mr. Russo, Matthew Russo,
4 still at the scene?

5 A I don't believe so.

6 Q Do you recall seeing Mr. Peruta at that scene?

7 A No.

8 Q Did anyone make you aware that Mr. Peruta was at
9 the scene at some point?

10 A I don't believe so, but it's possible.

11 Q Do you know if Mr. Peruta arrived after you
12 arrived at the scene?

13 A No idea.

14 Q Before -- and leaving out your attorney, but
15 before I just mentioned to you did you observe Mr. Peruta
16 at the scene, did you have any indication that Mr. Peruta
17 had been at the scene at 38 Kelsey Street?

18 A I don't remember. Like on the night of the
19 incident are you asking?

20 Q Any information you've gotten between
21 August 7th, 2015, and now, excluding whatever's privileged
22 with your attorney, did it come to your attention
23 indirectly that Mr. Peruta had been at the 38 Kelsey
24 Street scene?

25 A I believe so.

1 Q And how did that come to your attention?

2 A I'm not specifically positive who told me, but I
3 want to say in conversation with commanders at the police
4 department.

5 Q Okay.

6 A That he had made a complaint about that incident
7 that night.

8 Q And do you know the nature of the complaint?

9 A No, I don't.

10 Q Do you know who the complaint was made to?

11 A Internal Affairs maybe? Guessing?

12 MR. HARRIS: Don't guess.

13 A Okay. No, I don't.

14 MR. HARRIS: Answer what you know or what
15 you don't know.

16 BY MS. BAIRD:

17 Q And who were the commanders that brought this to
18 your attention?

19 A I don't -- I don't want to guess.

20 Q Okay. What would they have been commanders of?

21 A I don't want to guess.

22 Q Well, what is a commander at the Hartford Police
23 Department? What does that mean?

24 A Generally someone who is above the rank of
25 sergeant and has a division.

1 Q Okay. So there's a lot of commanders.

2 A Yeah.

3 Q Other than this possibility that one or more
4 commanders may have brought Mr. Peruta's presence at the
5 38 Kelsey Street scene to your attention, and excluding
6 any privileged information between you and your attorney,
7 any other knowledge or information that was imparted to
8 you about Mr. Peruta at the 38 Kelsey Street scene?

9 A I have knowledge that he was at the Kelsey
10 Street and had filed some sort of action based on his
11 presence there.

12 Q Okay. And other than the knowledge that you've
13 just indicated that he was present and filed some sort of
14 complaint about his presence there, outside of that
15 information do you know what the nature of his complaint
16 was or any issues that arose?

17 A I don't.

18 Q Okay.

19 MS. BAIRD: Okay. I don't have any further
20 questions. That's it.

21 MS. HARRIS: I have a few just to clarify a
22 couple of things real quick.

23

24

25

CROSS-EXAMINATION

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BY MS. HARRIS:

Q Deputy Chief Foley, Attorney Baird asked you some questions about the media policies earlier in the deposition. With regard to -- could you look at Exhibit 66, please? And Exhibit 66 is the media policy with effective date 4/01/01; is that correct?

A Yes.

Q Which would have been in effect at the time of the Park Street incident with Mr. Peruta; correct?

A Yes.

Q All right. You've had some questioning -- comments -- you made some comments about the term "authorized news media."

A Yeah.

Q As a matter of actual practice, did you, in the course of your duties as the Public Information Officer, differentiate between authorized media and any other type of media?

A No.

Q In your duties as a Public Information Officer, did you generally treat anyone who presented themselves as a member of the media as a member of the media?

A Yes.

1 Q Did you always treat Mr. Peruta as a member of
2 the media?

3 A Yes.

4 Q And at the time of the incident on Park Street,
5 you knew Mr. Peruta was a member of the media.

6 A Yes.

7 Q I just want to clarify. You made a few -- when
8 you arrived on the scene at Park Street, I presume you
9 parked away from the crime scene; correct?

10 A Correct.

11 Q And you walked to where the crime scene was?

12 A Yeah.

13 Q Okay. As you were walking toward the crime
14 scene, did you see any media that had already gathered,
15 other than Mr. Peruta?

16 A It's possible.

17 Q Do you have a specific recollection of that?

18 A No. But generally when I arrive to a crime
19 scene, I look around to see if there is any media there.
20 Just look. Do I see trucks. And I believe -- I knew
21 media was there before I got there.

22 Q All right. And the media that was there before
23 you got there, were they standing by crime scene tape?

24 A I believe so.

25 Q Did you have to cross that crime scene tape to

1 get further to where the body was?

2 A I believe so.

3 Q Did you meet Mr. Peruta after you crossed that
4 crime scene tape?

5 A I think I did, on the outer perimeter of the
6 crime scene.

7 Q Is it unusual that there may be multiple layers
8 of crime scene tape at any given crime scene?

9 A That is usual.

10 Q Were there multiple layers of crime scene tape
11 at this incident?

12 A I believe so.

13 Q So did you meet Mr. Peruta between the outermost
14 layer of crime scene tape and another layer of crime scene
15 tape?

16 A I think so.

17 Q The area where you met Mr. Peruta, though, that
18 was -- approximately how far away from that, as best you
19 can estimate, was that from the area of Park Street where
20 the body was?

21 A I think a block away or so?

22 Q Okay.

23 A Couple hundred feet?

24 Q Okay.

25 A Typically when I leave, the last thing I do at

1 the scene is address the media and then I leave.

2 Q Okay. At the incident on Park Street, did you
3 eventually at some point address the media at Park Street?

4 A I did. At the Park and Lawrence. And I
5 remember now specifically they were there. Which is
6 another block west of Broad.

7 Q All right. Let me just ask questions. So do
8 you recall addressing the media more than one occasion --
9 other than your specific interaction with Mr. Peruta, when
10 you say you addressed the media, it's sort of almost like
11 a press conference essentially?

12 A Yes.

13 Q All right. So you made a public statement to
14 the media?

15 A A stand-up; correct.

16 Q Was Mr. Peruta -- do you recall whether he was
17 present when you made that statement?

18 A I don't recall. I don't think he was, but it's
19 possible he could have been behind me or out of the
20 lights and everything.

21 Q And that would have been --

22 A Further.

23 Q -- a period of time after you had spoken to
24 Mr. Peruta --

25 A Yes.

1 Q -- about that conversation we've talked about.

2 A Yes.

3 Q Okay.

4 MS. HARRIS: I don't have any other
5 questions.

6 MS. BAIRD: I think I just have one more.

7

8 REDIRECT EXAMINATION

9

10 BY MS. BAIRD:

11 Q In that interaction that you had with
12 Mr. Peruta -- number one, there was just one interaction
13 with Mr. Peruta at the Park Street incident?

14 A I may have walked by a couple times.

15 Q Okay. But the one you recall is where there was
16 a verbal exchange.

17 A Yes. "Hello, Mr. Peruta. How are you?" That
18 sort of thing. Yes.

19 Q Well, but that "hello, Mr. Peruta, how are you,"
20 did that occur when you were face to face with him?

21 A Yes.

22 Q Did Mr. Peruta ever indicate to you that he
23 intended to file a complaint?

24 A Specifically I don't remember.

25 Q Okay. Did you ever indicate to Mr. Peruta that

1 he knew the drill and to go ahead and file a complaint?

2 A I don't remember saying that.

3 Q Okay. Could you have said that?

4 A Not that I -- I could have -- I possibly could
5 have said that. I don't know. I don't want to guess.

6 MS. BAIRD: No further questions. That's
7 it.

8 MS. HARRIS: Okay. We're all set.

9

10 [Deposition concluded: 5:04 p.m.]

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1 STATE OF CONNECTICUT :
2 COUNTY OF HARTFORD :
3
4 Ss: WEST HARTLAND

5 I, PATRICIA TYSZKA, a Registered Merit Reporter and
6 Notary Public duly commissioned and qualified in and for
7 the State of Connecticut, do hereby certify that pursuant
8 to notice there came before me on March 22, 2017, the
9 following-named person to wit: BRIAN FOLEY, who was by me
10 duly sworn to testify to the truth and nothing but the
11 truth; that he was thereupon carefully examined upon his
12 oath and his examination reduced to writing under my
13 supervision; that this transcript is a true record of the
14 testimony given by the witness.

15 I further certify that I am neither attorney nor
16 counsel for nor related to nor employed by any of the
17 parties to the action in which this deposition is taken;
18 and further, I am not a relative or employee of any
19 attorney or counsel employed by the parties hereto, or
20 financially interested in this action.

21
22 _____
23 Patricia Tyszka
24 LSR, RMR and Notary Public
25 CT Lic. #0046

DATE

24 My Commission Expires:
25 May 31, 2020

<p>BY MS. BAIRD: [74] 7/1 8/24 10/16 12/8 13/12 14/11 15/6 16/15 17/17 19/8 20/25 21/13 23/11 24/19 25/1 28/6 28/19 29/5 29/23 30/14 31/23 35/16 36/14 37/1 37/19 38/8 44/25 45/6 46/7 46/20 49/18 50/10 59/7 62/18 63/7 63/17 64/16 66/5 66/13 67/9 67/17 67/22 68/7 68/22 69/12 70/2 70/7 70/13 71/9 71/17 71/20 72/10 72/16 72/23 73/8 73/19 73/24 75/5 75/8 75/16 76/7 76/23 77/4 77/9 77/17 77/24 78/6 78/12 78/17 78/23 80/10 81/7 83/15 89/8 BY MS. HARRIS: [1] 85/1 COURT REPORTER: [3] 64/9 74/23 75/1 MR. HARRIS: [44] 12/5 13/7 15/16 16/1 16/5 17/9 19/3 20/21 21/7 22/23 24/16 24/23 27/18 28/10 28/25 29/20 31/22 34/1 34/19 35/1 35/4 36/12 36/18 37/17 37/21 46/5 46/14 49/15 50/6 59/1 62/15 65/7 65/13 65/16 65/23 65/25 67/12 76/5 76/21 76/25 80/6 80/25 83/11 83/13 MS. BAIRD: [31] 6/9 14/25 15/3 15/23 16/4 16/7 17/11 23/1 23/4 23/7 34/3 34/11 34/24 35/3 35/14 36/20 36/23 37/25 44/20 44/23 45/2 63/15 65/15 66/1 67/14 80/9 80/22 81/5 84/18 89/5 90/5 MS. HARRIS: [20] 10/9 14/14 14/18 14/21 15/1 15/19 23/6 30/8 30/11 34/4 34/13 36/21 37/23 59/4 63/5 63/9 63/16 84/20 89/3 90/7 THE WITNESS: [16] 14/20 15/18 22/25 23/3 24/18 30/9 38/2 44/19 45/3 59/3 64/10 65/11 65/19 74/25 75/3 81/2</p>	<p>18 [6] 4/6 4/8 10/2 10/20 77/23 78/3 19 [2] 78/5 78/14</p> <hr/> <p>2</p> <p>2.08 [1] 4/6 2/16/07 [1] 4/6 2/16/17 [2] 13/1 17/17 2/16/2017 [2] 18/21 35/6 2001 [3] 27/23 28/4 31/11 2002 [1] 2/6 2014 [12] 50/22 51/16 51/24 54/8 55/23 56/18 65/4 68/20 76/11 76/18 77/21 80/1 2015 [2] 81/10 82/21 2017 [11] 1/9 1/18 11/17 18/14 18/21 35/6 48/1 91/4 91/13 92/21 93/7 2020 [1] 93/24 203 [1] 1/24 2142 [3] 52/3 52/4 53/12 2144 [4] 52/17 52/19 53/17 53/23 2190 [1] 1/24 22 [3] 1/9 1/18 91/4 22, 2017 [1] 93/7 24 [2] 66/3 79/5 253 [1] 6/2 26 [2] 12/12 19/13 27 [7] 4/9 11/7 11/8 11/11 13/7 16/11 17/14 271-2190 [1] 1/24 2:35 [1] 1/18 2:58 [1] 23/11</p> <hr/> <p>3</p> <p>31 [1] 93/24 330 [1] 1/23 347 [1] 54/3 36 [6] 58/19 58/20 61/16 79/3 79/5 79/15 38 [5] 81/10 82/17 82/23 84/5 84/8 3:01 [1] 23/11 3:15-CV-01209-RNC [1] 1/6 3:40 [1] 44/23 3:42 [2] 44/23 45/6 3:43 [1] 45/6</p> <hr/> <p>4</p> <p>4/01/01 [1] 85/8 4/1/01 [6] 17/15 18/13 18/14 18/21 35/19 35/24 44 [1] 52/23 4:20 [1] 66/5 4:23 [1] 66/5 4:46 [1] 81/5 4:51 [1] 81/5</p> <hr/> <p>5</p> <p>5 from [1] 79/5 5:04 [1] 90/10</p> <hr/> <p>6</p> <p>6 feet [1] 57/21 605-9340 [1] 2/6 61 [1] 6/16 61H [1] 4/5 63 [3] 4/5 6/13 6/21 63-66 [1] 6/9 64 [15] 4/6 4/7 9/22 9/24 10/18 10/24 11/2 11/10 11/16 11/23 12/2 13/4 13/25 16/10 17/16 65 [50] 4/7 16/5 16/15 16/18 16/22</p>	<p>17/15 18/4 19/21 19/22 20/11 21/6 21/16 22/5 23/14 23/22 24/7 24/16 24/23 25/17 26/19 27/6 33/15 33/18 33/25 35/3 38/24 42/11 42/22 43/5 43/6 44/18 45/2 45/9 45/12 45/18 46/2 46/14 47/1 47/25 48/1 48/5 48/7 48/10 48/17 48/21 49/5 49/12 49/21 50/4 50/14 66 [56] 4/9 6/9 16/15 16/18 16/22 17/13 18/12 18/16 19/23 20/2 21/7 25/18 26/18 27/6 28/9 28/23 29/9 29/25 30/6 31/14 31/25 32/5 32/12 32/20 33/6 33/20 35/19 36/2 36/6 36/11 36/18 37/9 38/12 38/16 38/19 38/23 41/12 41/16 41/20 42/8 42/18 42/22 43/1 43/5 43/6 44/14 44/18 46/2 46/4 46/9 46/12 46/22 48/11 49/7 85/7 85/7</p> <hr/> <p>7</p> <p>7-page [1] 36/11 7-second [2] 70/16 70/17 7th [2] 81/10 82/21</p> <hr/> <p>8</p> <p>85 [1] 3/13 860 [2] 2/6 2/12 89 [1] 3/14 899-1656 [1] 2/12</p> <hr/> <p>9</p> <p>9/12/2014 [2] 54/8 65/4 905 [3] 53/22 53/23 54/4 9340 [1] 2/6 9:42 [1] 52/4 9:42 p.m [1] 52/3</p> <hr/> <p>A</p> <p>able [10] 16/21 16/24 16/25 29/25 55/13 55/17 63/2 63/9 69/23 79/4 about [43] 25/12 26/12 26/14 26/16 32/4 34/7 35/3 35/18 36/16 37/10 37/11 38/11 41/20 42/19 43/2 43/3 44/15 44/16 47/5 50/24 56/17 57/7 57/15 57/21 58/10 58/12 61/19 63/11 63/15 65/13 76/12 76/14 76/20 76/22 78/14 80/16 83/6 84/8 84/14 85/5 85/14 89/1 89/1 above [1] 83/24 access [3] 29/15 47/13 49/8 accident [1] 47/20 accommodations [3] 8/3 8/4 8/6 accordance [1] 49/2 accreditation [5] 11/14 11/17 11/18 18/9 48/25 accurate [4] 8/10 52/19 91/5 92/3 accurately [2] 8/9 61/17 act [1] 21/22 acting [1] 60/4 action [4] 1/6 84/10 93/16 93/19 activities [1] 68/14 activity [4] 66/17 69/24 70/9 75/21 actual [1] 85/17 additional [3] 26/10 52/16 53/16 additions [1] 92/3 address [3] 19/11 88/1 88/3 addressed [4] 15/11 46/1 46/13 88/10 addresses [3] 32/15 45/25 46/23 addressing [3] 28/10 43/22 88/8 adequacy [1] 5/10</p>
<p>0</p> <p>0046 [4] 1/22 91/21 92/25 93/23 01 [7] 17/15 18/13 18/14 18/21 35/19 35/24 85/8 06103 [2] 2/12 6/3 06410 [1] 1/24 06791-2002 [1] 2/6 07 [1] 4/6 08 [2] 12/25 13/3</p> <hr/> <p>1</p> <p>10 [3] 63/24 72/9 72/13 10-second [2] 69/15 69/19 100 [1] 2/11 11 [4] 72/15 72/18 75/18 75/22 12 [3] 44/14 72/22 72/25 12th [11] 2/11 50/22 51/16 51/23 55/23 56/18 68/20 76/11 76/18 77/21 80/1 13 [6] 45/17 46/2 46/14 47/2 73/7 73/11 14 [1] 73/22 15 [4] 1/18 2/5 48/6 74/2 15 yards [1] 63/25 16 [13] 4/8 4/9 18/14 48/6 48/10 48/16 48/21 49/5 49/12 49/20 50/14 75/7 75/13 1656 [1] 2/12 16th [2] 11/17 48/1 17 [6] 13/1 17/17 75/15 75/19 75/22 77/19</p>	<p>19 [2] 78/5 78/14</p> <hr/> <p>2</p> <p>2.08 [1] 4/6 2/16/07 [1] 4/6 2/16/17 [2] 13/1 17/17 2/16/2017 [2] 18/21 35/6 2001 [3] 27/23 28/4 31/11 2002 [1] 2/6 2014 [12] 50/22 51/16 51/24 54/8 55/23 56/18 65/4 68/20 76/11 76/18 77/21 80/1 2015 [2] 81/10 82/21 2017 [11] 1/9 1/18 11/17 18/14 18/21 35/6 48/1 91/4 91/13 92/21 93/7 2020 [1] 93/24 203 [1] 1/24 2142 [3] 52/3 52/4 53/12 2144 [4] 52/17 52/19 53/17 53/23 2190 [1] 1/24 22 [3] 1/9 1/18 91/4 22, 2017 [1] 93/7 24 [2] 66/3 79/5 253 [1] 6/2 26 [2] 12/12 19/13 27 [7] 4/9 11/7 11/8 11/11 13/7 16/11 17/14 271-2190 [1] 1/24 2:35 [1] 1/18 2:58 [1] 23/11</p> <hr/> <p>3</p> <p>31 [1] 93/24 330 [1] 1/23 347 [1] 54/3 36 [6] 58/19 58/20 61/16 79/3 79/5 79/15 38 [5] 81/10 82/17 82/23 84/5 84/8 3:01 [1] 23/11 3:15-CV-01209-RNC [1] 1/6 3:40 [1] 44/23 3:42 [2] 44/23 45/6 3:43 [1] 45/6</p> <hr/> <p>4</p> <p>4/01/01 [1] 85/8 4/1/01 [6] 17/15 18/13 18/14 18/21 35/19 35/24 44 [1] 52/23 4:20 [1] 66/5 4:23 [1] 66/5 4:46 [1] 81/5 4:51 [1] 81/5</p> <hr/> <p>5</p> <p>5 from [1] 79/5 5:04 [1] 90/10</p> <hr/> <p>6</p> <p>6 feet [1] 57/21 605-9340 [1] 2/6 61 [1] 6/16 61H [1] 4/5 63 [3] 4/5 6/13 6/21 63-66 [1] 6/9 64 [15] 4/6 4/7 9/22 9/24 10/18 10/24 11/2 11/10 11/16 11/23 12/2 13/4 13/25 16/10 17/16 65 [50] 4/7 16/5 16/15 16/18 16/22</p>	<p>17/15 18/4 19/21 19/22 20/11 21/6 21/16 22/5 23/14 23/22 24/7 24/16 24/23 25/17 26/19 27/6 33/15 33/18 33/25 35/3 38/24 42/11 42/22 43/5 43/6 44/18 45/2 45/9 45/12 45/18 46/2 46/14 47/1 47/25 48/1 48/5 48/7 48/10 48/17 48/21 49/5 49/12 49/21 50/4 50/14 66 [56] 4/9 6/9 16/15 16/18 16/22 17/13 18/12 18/16 19/23 20/2 21/7 25/18 26/18 27/6 28/9 28/23 29/9 29/25 30/6 31/14 31/25 32/5 32/12 32/20 33/6 33/20 35/19 36/2 36/6 36/11 36/18 37/9 38/12 38/16 38/19 38/23 41/12 41/16 41/20 42/8 42/18 42/22 43/1 43/5 43/6 44/14 44/18 46/2 46/4 46/9 46/12 46/22 48/11 49/7 85/7 85/7</p> <hr/> <p>7</p> <p>7-page [1] 36/11 7-second [2] 70/16 70/17 7th [2] 81/10 82/21</p> <hr/> <p>8</p> <p>85 [1] 3/13 860 [2] 2/6 2/12 89 [1] 3/14 899-1656 [1] 2/12</p> <hr/> <p>9</p> <p>9/12/2014 [2] 54/8 65/4 905 [3] 53/22 53/23 54/4 9340 [1] 2/6 9:42 [1] 52/4 9:42 p.m [1] 52/3</p> <hr/> <p>A</p> <p>able [10] 16/21 16/24 16/25 29/25 55/13 55/17 63/2 63/9 69/23 79/4 about [43] 25/12 26/12 26/14 26/16 32/4 34/7 35/3 35/18 36/16 37/10 37/11 38/11 41/20 42/19 43/2 43/3 44/15 44/16 47/5 50/24 56/17 57/7 57/15 57/21 58/10 58/12 61/19 63/11 63/15 65/13 76/12 76/14 76/20 76/22 78/14 80/16 83/6 84/8 84/14 85/5 85/14 89/1 89/1 above [1] 83/24 access [3] 29/15 47/13 49/8 accident [1] 47/20 accommodations [3] 8/3 8/4 8/6 accordance [1] 49/2 accreditation [5] 11/14 11/17 11/18 18/9 48/25 accurate [4] 8/10 52/19 91/5 92/3 accurately [2] 8/9 61/17 act [1] 21/22 acting [1] 60/4 action [4] 1/6 84/10 93/16 93/19 activities [1] 68/14 activity [4] 66/17 69/24 70/9 75/21 actual [1] 85/17 additional [3] 26/10 52/16 53/16 additions [1] 92/3 address [3] 19/11 88/1 88/3 addressed [4] 15/11 46/1 46/13 88/10 addresses [3] 32/15 45/25 46/23 addressing [3] 28/10 43/22 88/8 adequacy [1] 5/10</p>

<p>A</p> <p>Affairs [6] 56/17 56/20 56/21 57/7 57/12 83/11 after [6] 6/3 16/12 76/18 82/11 87/3 88/23 afternoon [1] 7/4 again [21] 18/15 21/12 26/24 27/7 32/10 36/19 38/14 41/24 44/2 46/6 46/16 48/5 49/11 53/12 59/22 61/1 62/18 64/21 67/7 71/11 79/15 against [1] 7/8 agencies [2] 33/19 41/5 ago [5] 7/21 21/17 26/6 26/7 64/15 agree [4] 17/8 23/22 33/17 46/12 agreed [3] 5/10 5/12 5/15 agreement [1] 6/19 ahead [6] 10/5 29/2 38/3 41/24 42/16 90/1 AL [1] 1/10 all [23] 4/12 13/23 13/24 16/21 17/3 17/5 18/15 19/6 20/22 21/13 23/4 26/17 43/19 47/14 64/9 65/12 66/12 68/17 85/13 86/22 88/7 88/13 90/8 allow [3] 31/15 31/20 34/9 allowed [1] 59/2 almost [1] 88/10 along [1] 49/4 already [3] 53/24 66/9 86/14 also [6] 2/16 9/2 53/8 53/16 60/4 81/16 Although [1] 15/4 always [2] 47/24 86/1 am [13] 8/14 8/15 11/10 16/24 18/4 19/12 29/15 29/18 57/1 57/20 70/9 93/14 93/17 ambulance [2] 74/4 74/5 AMERICAN [3] 1/6 7/7 40/6 and further [1] 93/17 and/or with [1] 91/6 Andrews [1] 1/23 another [4] 15/25 58/8 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